

From: (b) (6) >
Sent: Monday, September 05, 2016 9:09 PM
To: HarborComments
Subject: Willamette River Superfund Site

Dear Administrator Gina McCarthy,

I am not satisfied with the level of clean-up required in the newly-released draft cleanup plan for the Portland Harbor Superfund Site. I strongly urge that it Be Revised to require greater removal of toxins, that are so onerous that it has been designated a Superfund Site.

The Willamette runs through the center of Portland, a significant population area - and a population that is highly active in outdoor settings including the Willamette River. This high degree of human engagement in the Willamette River is not going to decline, but will likely increase as trends have shown, making exposures to the significant remaining toxins allowed by the draft plan an alarming prospect for the future.

Additionally, Portland and the Willamette are home to range of wildlife including Ospreys, Bald Eagles, Otters, Great Blue Herons, many species of fish and more. The draft plan would allow continued unacceptable exposures of wildlife to the Superfund site toxins.

Currently, it is not safe for a healthy adult person to eat more than eight ounces of fish per month from the Willamette River Superfund area. For pregnant or nursing women, no amount of resident fish is considered safe.

Further, the City of Portland has spent significant money in the recent past to build major infrastructure improvements to prevent sewage overflows into the Willamette River, to improve its water quality. The Superfund site plan should similarly be required to bring the water toxin level in the Willamette to a much lower level than will be the case with the draft plan.

I urge the EPA to focus the clean-up plan on Removal of contaminated sediment, and properly addressing that sediment in an appropriate site and manner; and reduce the reliance on Monitored Natural Recovery that is so heavily relied on in the drafty plan.

I strongly urge the EPA to make the following changes to the plan:

1. Select Alternative G, with additional dredging in areas of high human use, areas of high ecological value, and areas where there is high risk of recontamination of the river.
2. Set much clearer timelines and metrics for success, including an explicit date by which Portland Harbor specific fish consumption advisories will be lifted.
3. Select an alternative that will clean the waters sufficiently to reduce toxin levels in fish to safe levels for consumption by children and pregnant women.
4. Expand the scope of the clean-up site to include the heavily contaminated uplands as well as the heavily contaminated river.

5. Eliminate the confined disposal facility which would create a permanent toxic waste dump in the river.

Finally, the public engagement strategies used for the clean-up plan have not well-addressed environmental justice, specifically delineating strategies for ensuring the jobs, economic benefits and other benefits associated with the Superfund process are accessible to the local community and particularly to underserved communities that have been impacted by contamination in Portland Harbor. EPA is strongly urged to redress these deficiencies from this point on in the Superfund process.

Portland's natural areas and beauty are a significant and heavily used asset. Please revise the draft plan to mandate a more thorough removal of toxins.

Thank you, and with respect.

Sincerely,

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